

Title I.A Nonpublic Low Income and Residential Verification

Nonpublic schools complete the Nonpublic Registration in the fall of each year with the Missouri Department of Elementary and Secondary Education (DESE). During consultation, the Local Education Agency (LEA) and nonpublic school must decide on the method the nonpublic school will use in determining economic deprivation. However, the LEA has the final authority in the method selected. During registration, the nonpublic will choose the method determined at consultation. As part of the LEA's responsibility in the Nonpublic Registration, the LEA must verify enrollment counts, economic deprivation method, and economic deprivation counts reported by each nonpublic school that has children residing in the LEA's boundaries.

The methods for determining economic deprivation:

1. The same measure of poverty used to count public school children. If the same measure of poverty used to count public school children is available for private school students (e.g., Free and Reduced Price Lunch (FRPL) data) and an LEA concludes, after consultation with appropriate private school officials, that the data will yield an accurate count of private school students, Missouri Department of Elementary and Secondary Education (DESE) recommends the LEA use the same measure.

2. Comparable poverty data from a survey and allowing such survey results to be extrapolated if complete actual data are unavailable. An LEA may use a survey to obtain poverty data comparable to those used for public school students. To the extent possible, the survey must protect the identity of families of private school students. An LEA should not require that the private school officials give the names of low-income families. The only information necessary for an LEA to collect from such a survey of private school children is—

- (1) verification of residence in a participating Title I public school attendance area;
- (2) grade level and age of each child; and
- (3) income level of parents.

If, based on consultation with private school officials, an LEA chooses to extrapolate the survey results to the private school's entire enrollment, the LEA will also need the private school's enrollment. For example, in a private school with an enrollment of 400, if an LEA receives survey data for 300 children that indicate that 150 children are from low-income families (50 percent), to extrapolate the results the LEA would multiply 400 by 0.5 to determine that there are 200 children in the school from low-income families.

3. Proportionality. An LEA may apply the low-income percentage of each participating Title I public school attendance area to the number of private school children who reside in that school attendance area to derive the number of private school children from low-income families. To do this, an LEA will need the addresses, grade levels, and ages of those students attending private schools. For example, if the percentage of poverty in a public school attendance area is 60 percent and there are 50 private school children residing in the public school attendance area, the LEA would derive 30 private school children from low-income families who reside in the attendance area.

4. An equated measure. An LEA may use an equated measure of low-income by correlating sources of data—that is, determining the proportional relationship between two sources of data on public school children and applying that ratio to a known source of data on private

school children. For example, an LEA uses FRPL data, but those data are not available for private school students. However, if Temporary Assistance for Needy Families (TANF) data are available, the LEA could determine an equated measure of poor children in private schools based on FRPL data by correlating the two sets of data as follows:

$$\frac{\text{TANF (public)}}{\text{FRPL (public)}} = \frac{\text{TANF (private)}}{\text{FRPL (private) X (private)}}$$

In this example, the LEA may then use the equated number of private school children based on FRPL data ("X") as the number of private school children from low-income families.

5. Comparable poverty data from a different source. An LEA may use poverty data for private school children that are from a different source than the data it uses for public school children so long as the income threshold in both sources is generally the same. For example, an LEA uses FRPL data, but private school children do not participate in the free and reduced-price lunch program; however, private school officials are able to provide an LEA with a count of children who are from low-income families using other comparable sources of poverty data such as eligibility for means-tested tuition scholarship programs.

If the nonpublic chooses **methods 1, 2, 4, or 5**, the following will be required to be provided to the LEA:

- For families **WITH** economic deprivation: address, income or direct certification documentation, grade level of each child, and household size of each family; and,
- For families **WITHOUT** economic deprivation: address and grade level of each child in the LEA's boundaries. All eligible children that reside in the LEA may be served.

If the nonpublic chooses **method 3**, the following will be required to be provided to the LEA:

- Address and grade level of each child in the LEA's boundaries. All eligible children that reside in the LEA may be served.